

12 June 2018

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Re: HNZ reply to Architectural Centre submission on proposed HNZ listing Wellington Teachers' Training College (Former)

Thank you for your detailed response of 11 May 2018 to our submission on the Wellington Teachers Training College (Former) at Karori. We note the following:

1. Our letter was written prior to knowledge of Ryman's application for a certificate of compliance. We consider the current threat to the site incredibly concerning and that listing will be an insufficient measure to achieve positive heritage outcomes.
2. With reference to your paragraph 7, our recommendation regarding lodging a Notice of Requirement for a Heritage Order stated such a mechanism remain in place "until the site is listed on the Wellington District Plan, or longer is deemed appropriate," and needs to be read in the context that we asked HNZ to lodge a notice of requirement for a Heritage Order immediately. This is because the HNZ listing process and entry on the HNZ List provides no legal protection, in contrast to a listing in the WCC DP. In the current context where Ryman have a certificate of compliance to demolish approximately half the heritage site has significantly changed the context and we consider that the need to lodge a notice of requirement for a Heritage Order and retain any consequent Heritage Order for at least the next five years to be paramount.
3. We are immensely concerned that addressing the under-representation of modernist architecture is considered (as stated in your paragraph 5) to not currently be "within the framework of Heritage New Zealand's strategic objectives and policies." This suggests that HNZ has a date prejudice which is inappropriate and contrary to the Heritage New Zealand Act which states that HNZPT's functions include "to identify, record, investigate, assess, list, protect, and conserve historic places." There is nothing that we can see in the Act which has a bias against modernist architecture.
4. We are pleased in your paragraph 5 that advice from the Architectural Centre regarding possible modernist sites to be listed will be sought. In our previous discussion with Karen Astwood only Docomomo was mentioned by Heritage NZ as having input into this.
5. We are pleased to hear that recent HNZ practice to treat *Long Live the Modern* as if it is definitive will discontinue.

Thanks again for the time taken to consider and respond to our submission.

Yours faithfully



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